

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

AMPEREX TECHNOLOGY LIMITED,

Defendant.

CIVIL ACTION NO. 6:21-cv-347-ADA
[LEAD CASE]

JURY TRIAL DEMANDED

AMPEREX TECHNOLOGY, LIMITED,

Plaintiff,

v.

MAXELL, LTD.

Defendant.

CIVIL ACTION NO. 6:21-cv-1007-ADA

JURY TRIAL DEMANDED

JOINT (AGREED) MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c), Local Rule CV-26(c), and Section VII of the Court's Standing Order Governing Proceedings (OGP) 4.0—Patent Cases, plaintiff Maxell, Ltd. and defendant Amperex Technology Limited hereby submit this Joint Motion for Entry of Protective Order in the above-captioned litigation. Having agreed upon the terms included therein, the parties respectfully request that the Court grant this motion and enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: March 25, 2022

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Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2022, a true and correct copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Erik Shallman
Erik Shallman